

Farmland Reserve, Inc.

139 E. South Temple, Suite 600
Salt Lake City, UT 84111-1103
(801) 715-9100

January 18, 2012

Bureau of Land Management
Lander Field Office
Attn: Kristin Yannone, RMP Project Manager
1335 Main
Lander, WY 82520



RE: COMMENTS ON THE DRAFT RESOURCE MANAGEMENT PLAN AND
ENVIRONMENTAL IMPACT STATEMENT FOR THE LANDER FIELD OFFICE
PLANNING AREA

These comments are submitted in response to the Draft Resource Management Plan and Environmental Impact Statement for the Lander Field Office Planning Area issued August 31, 2011. The comments are submitted on behalf of the Corporation of the Presiding Bishop of The Church of Jesus Christ of Latter-day Saints (CPB), and Farmland Reserve, Inc. (FRI), both of which are corporate entities of The Church of Jesus Christ of Latter-day Saints (LDS Church).

- BLM currently leases to CPB approximately 940 acres located within and near Martin's Cove, as addressed in the Decision of Record, Finding of No Significant Impact, and Environmental Assessment issued in October, 2004.
- FRI, sometimes identified as "Farm Management Company" or "Mormon Handcart Historic Sites," actively uses the portion of the National Historic Trails between Sixth Crossing (of the Sweetwater River) and Rock Creek Hollow for LDS Church groups to conduct "handcart treks" intended to reenact 19th Century pioneer migrations. The reenactments are managed within guidelines established in Special Recreation Permit No. WY050-SRP-11-02 (the "SRP") and other special use permits issued under the Finding of No Significant Impact and Decision Record issued March 28, 2005.

On behalf of these entities and the interests they represent, we thank you for the opportunity to submit comments on the Draft RMP/EIS, and respectfully request your thoughtful consideration of them.

We wish to thank the Lander Field Office for its efforts in compiling the Draft RMP and EIS. It is a well-organized and well-written document providing comprehensive analysis of the diverse cultural and natural resources in the Planning Area. There are, however, three comments submitted here on behalf of CPB and FRI.

First, the "Social Characteristics" outlined in Appendix C, Table C.15 on page 1385, include dates and figures different from those outlined in the Finding of No Significant Impact and Decision Record issued March 28, 2005 and the SRP. For example, the SRP establishes the maximum group size at 200 individuals, while the draft RMP/EIS states that "the average group size...should not exceed 100 people/group for three consecutive years" (1385). Similarly, the draft RMP implies that groups will be authorized only from July 1 to August 15, whereas the SRP and the Decision Record establish July 1 through September 15 as the approved season for group reenactments. The Draft RMP/EIS does not

Bureau of Land Management
Kristin Yannonne
Page 2
January 18, 2012

provide explanation for these differences. The reduced group size and the time limitation would significantly reduce the ability of LDS Church groups to engage in the historic handcart trek reenactments.

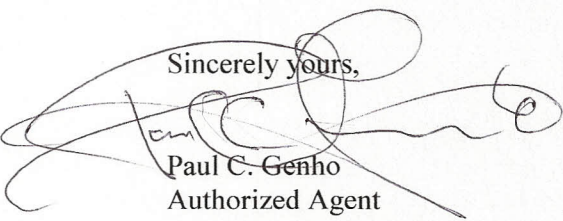
Second, the Draft RMP/EIS does not present information concerning the likely impacts from trail use management under Alternative D (the preferred alternative). Section 4.7.1 ("Congressionally Designated Trails – Cultural and Historic Resources," on page 1035) outlines the various impacts for the four alternatives in some detail. For Alternatives A, B, and C there are specific statements under the subheadings titled "Resource Use" about expected impacts from managing use of the Trails, which includes use for group treks. Notably, however, no such information is provided for Alternative D in spite of it being the preferred alternative. We believe this is confusing and request that it be rectified, especially given that Alternative D promotes the continued use of the Trails for group treks.

Third, we request that the RMP and EIS include language that recognizes and documents the full significance to LDS Church members of using the Trails to reenact the handcart pioneers' role in 19th Century history. We have concerns about characterizing this use as simply a recreational activity. It is far more than a recreational activity. The treks provide LDS Church members opportunity for deeply moving and important religious experiences, giving context to significant Church history and beliefs in an unmatched setting. The treks reconnect Church members and others who participate with them to the historic fabric of the 19th Century westward migrations, allowing participants to better understand the hardships, emotions, and courage of all pioneers of that time through a deeply personal experience on the very trails the pioneers used.

It is important that the RMP and EIS document this perspective. We offer to provide additional information concerning the sensitivity and significance of these cultural, historical, religious, and sociological values. We ask that these values be managed consistent with the way BLM has managed cultural resources to protect Traditional Cultural Properties and Traditional Lifeway Areas. It is also important that the RMP and EIS prescribe management that will ensure LDS Church members and the public with continued long-term access to these areas and opportunity to engage in the trekking experience at these significant locations. We also offer our assistance in your management responsibilities to ensure use of the Trails that is compatible with multiple use principles, preservation, and sound public land stewardship.

Thank you for consideration of these comments. We share with you and many others a profound interest in these National Historic Trails. We will continue to work with the BLM, other historic trail groups, and members of the public to maintain the appropriate balance between protection and use as mandated in the enabling legislation that created the Trails.

Sincerely yours,


Paul C. Genho
Authorized Agent

